

**STATE OF ALASKA**  
**DEPARTMENT OF NATURAL RESOURCES**  
**DIVISION OF FORESTRY**



**TOK AREA FORESTRY**

**PRELIMINARY BEST INTEREST FINDING AND  
DECISION FOR  
TOK HAZARDOUS FUELS TIMBER SALES**

**NC-1169-T, NC-1170-T, NC-1171-T, NC-1172-T**

**6/7/2019**

## **I. PROPOSED ACTION**

DOF is proposing to offer for sale approximately 260 acres of white spruce mixed pole and sawtimber from state lands in area of the community of Tok. The volume to be offered totals approximately 346,800 cubic feet, 6,242.4 tons or roughly 4,080 cords (*conversions based on 36lbs/cubic foot green spruce and 85 cubic feet/cord*). DOF would sell the timber as competitive bid timber sales for commercial use. For this timber sale, the PBIF and the Draft FLUPs are being issued for review at the same time. The land covered by this PBIF appeared in the 2019-2023 Tok Area Five Year Schedule of Timber Sales (FYSTS).

The management objectives for the proposed timber sales are:

- Support renewable resource development
- Decrease wildland fire risk near the community of Tok
- Promote forest health
- Maintain or improve wildlife habitat

## **II. STATUTORY AND REGULATORY AUTHORITY**

The Division is taking this action under the authority of:

- AS 38.05.035(e) Best Interest Finding;
- AS 38.05.110-120 and 11 AAC 71, Timber Sale Statutes and Regulations; and
- AS 41.17.010-950 and 11 AAC 95 Forest Resources and Practices Statutes and Regulations.

## **III. ADMINISTRATIVE RECORD**

The Division will maintain an administrative record regarding the decision of whether or not to proceed with the action as proposed. This record of the 4 sales will be maintained at the DOF's Tok Office filed as NC-1169-T, NC-1170-T, NC-1171-T, and NC-1172-T.

## **IV. SCOPE OF DECISION**

This preliminary best interest finding (PBIF) is the first part of step three of a six-step process to design, sell, and administer timber sales. The following list summarizes the overall process:

Step 1: Regional planning. The Department of Natural Resources (DNR) develops area plans and state forest management plans to designate appropriate uses for state land, classify the land accordingly, and establish management guidelines for multiple use. These plans determine where timber sales are an allowed use, and what other uses must be considered when designing and implementing sales. Subsequent land use decisions must be consistent with the area plans. The area in this PBIF is covered by the Eastern Tanana Area Plan (ETAP). The finding also considers the Interagency Wildland Fire Management Plan. There is a current Community Wildfire Protection Plan for the Tok Community.

Step 2: Five-Year Schedule of Timber Sales (AS 38.05.113). Generally, the Tok Area Office prepares a Five-Year Schedule of Timber Sales every other year. The Schedule identifies proposed sales, including their location, volume, and main access routes. The Five-Year Schedules are scoping documents that provide an opportunity for public, agency, and industry to identify potential issues and areas of interest for further consideration in the best interest finding and Forest Land Use

Plan. A proposed timber sale must appear in at least one of the two Five-Year Schedules preceding the sale.

Step 3: Best Interest Finding. A best interest finding is the decision document that:

- Establishes the overall area within which the timber sale may occur,
- Determines the amount of timber that will be offered for sale and the duration of the sale,
- Sets the overall harvest and reforestation strategy for the sale area,
- Determines whether the sale proposal complies with the Constitutional requirement to manage for sustained yield by evaluating the amount of timber in the sale and the annual allowable cut for the affected area,
- Selects the appropriate method of sale (i.e., competitive or negotiated sale), and
- Determines the appraisal method that will be used to determine the sale price.

The Preliminary Best Interest Finding (PBIF) is intended to provide sufficient information for reviewers to ensure that the best interest of the State will be served by the proposed action.

After public and agency review of the PBIF, DOF reviews comments, makes changes as appropriate, and issues a final best interest finding (BIF). DOF must adopt a final BIF before selling timber. A person affected by the final decision who provided timely written comment or public hearing testimony on the preliminary decision may appeal it, in accordance with 11 AAC 02.

Step 4: Forest Land Use Plans (AS 38.05.112). Prior to authorizing harvest of timber on any area greater than 10 acres, the DOF must adopt a site-specific Forest Land Use Plan (FLUP) for the harvest area. DOF will prepare individual FLUPs for the harvest areas within the overall sale area covered by this best interest finding. FLUPs specify the site, size, timing, and harvest methods for harvest unit within the sale area. FLUPs also address site-specific requirements for access construction and maintenance, reforestation, and multiple use management. Draft FLUPs will be based on additional field work, agency and community consultation, and site-specific analyses by the DOF, and will be subject to public and agency review.

Step 5: Timber sales and contracts. Following adoption of the final best interest finding, and completion of the FLUP(s), DOF will offer the timber for sale by auctioning competitive sales and/or negotiating some sales with purchasers. The Division will sign a contract with the winning bidder for each sale. The contract will include stipulations to ensure compliance with the best interest finding, FLUP, and statutory requirements.

Step 6: Sale administration. DOF administers timber sales and conducts field inspections to ensure compliance with the final best interest finding, FLUP, timber sale contract, and applicable laws, including the Alaska Forest Resources and Practices Act and regulations (AS 41.17 and 11 AAC 95), and forest management statutes and regulations in AS 38.05 and 11 AAC 71.

## **V. PROJECT LOCATION, LAND STATUS, AND DESCRIPTION**

### **A. Location**

The proposed harvest units are located north and west of Tok Junction. These units are located near the Red Fox Road in Sections 7, 8, 11, and 12 of Township 18 North, Range 12 East, Copper River Meridian.

## B. Title status

Township, Range, Meridian	Acquisition Authority	Classification Order	Land Use Plan
T 18N, R 12 E, COR	GS-108	NC-10-004 FOR WHB (U-21) STL (U-22)	ETAP

## C. Land use planning, classification, and management intent

The proposed area is within the Eastern Tanana Area Plan in units U-21 and U-22. The land use classification is listed for each unit. U-21 is to be managed for its forestry and wildlife habitat resource values and is to be retained in State ownership. U-22 is to be managed for land disposals (Settlement) as appropriate within the planning period. The DNR Land Sales Section was consulted prior to and during the development of these harvest units. These are areas that have been identified in the Tok Community Wildland Fire Protection Plan to be harvested to reduce the volume of hazardous fuels which pose a fire risk to the community. The harvest units are considered to be “inline” with that goal.

The Alaska Interagency Fire Management Plan includes these lands in the Critical protection category. All State lands around Tok have been incorporated into the Tok Community Wildland Fire Protection Plan.

There are no municipal plans that apply to the identified areas.

## D. Current access and land use:

The Red Fox Rd, Pump Station Fireline, Stardust Ave, Sundog Trail, and the Alaska Highway all provide primary all-season access to these units.

Current land uses include hunting, trapping, and personal use wood cutting as well as recreation.

## E. Background and description of proposal

1. Background: There are several small mill operators and firewood suppliers operating in the Tok area currently. In addition, the Tok School wood heat boiler utilizes wood chips and wood waste provided by several of these local area vendors. These proposed timber sales could continue to provide a raw material source for this operation as well as provide cordwood and sawtimber for the local community.

Following identification of the harvest areas, DOF reviewed existing land use plans, considered markets for the timber, and designed this proposal to utilize as much merchantable timber as possible from within the identified area on state land, while protecting wildlife, and avoiding impacts to local access, recreation uses and archaeological sites.

2. Timber volume and sustained yield: The harvest areas would be comprised of approximately 260 acres of white spruce, mixed pole and sawtimber, with volumes to be offered totaling approximately 346,800 cubic feet, 6,242.4 tons or roughly 4,080 cords (*conversions based on 36lbs/cubic foot green spruce and 85 cubic feet/cord*). NC-1169-T, and NC-1170-T are



not part of the Sustained Yield or Annual Allowable Cut calculations since these lands are designated for other uses.

3. Harvest unit design: The harvest units will be designed to mimic natural openings and maximize natural regeneration. The harvest plans will be intended to leave patches of young growth trees that are considered too small for commercial use while harvesting the older trees. Specific sizes and shapes will be outlined in the Forest Land Use Plans for each individual timber sale.
  - a. Reforestation and site preparation: The sale area will be reforested in compliance with the Forest Resources and Practices regulations (11 AAC 95.375-.390). DOF will be relying on natural regeneration of the stands which will encourage the regeneration of hardwoods.
  - b. Access design and construction: Access design, construction, and maintenance will comply with the Forest Resources and Practices regulations (11 AAC 95.285-.355).
    - There are no stream crossings within the harvest areas
    - Existing all-season road access will be utilized with some spur roads and skid trails interior of the unit boundaries
    - It is anticipated that the access roads will be active and maintained during harvest operations and remain active following completion of the harvest
  - c. Appraisal method: DOF will appraise the timber value in compliance with 11 AAC 71.092. Based on transactional evidence and market demand for saw logs/ cabin logs and fuelwood volume, DOF will apply a likely value for those delivered products. The State will be compensated based on that market rate minus the estimated total harvest cost. DOF will factor in local demand, timber type, amount of decay, and economies of scale in its decision to differentiate the cordwood from the sawlog volumes in the FLUPs. The method of payment will be determined by DOF as either lump sum or possibly multiple payment units.

## **F. Resources and management**

### **1. Timber**

- a. Timber stand composition and structure: The stands are nearly purely composed of even-aged white spruce with low volumes of aspen, birch and poplar present. Most of the areas are grossly over-stocked with mature spruce >5" at D.B.H., though some natural openings in the forest canopy have encouraged patches of regeneration.
- b. Stand silvics: The normally merchantable tree species in the Tok Area and adjacent highlands of the Alaska Range are white spruce, birch, aspen and balsam poplar. Data and research on regeneration and growth characteristics of this species are compiled within the Resource Analysis of the Tanana Valley State Forest (TVSF) Management Plan. The harvest and reforestation systems available in the Interior Alaska are also reviewed and listed in Resource Analysis. The results of the public and agency discussions for harvest and reforestation are discussed in the TVSF Management Plan. Silvicultural harvest systems that facilitate even-aged (natural) management are generally preferred. They mimic the ecological impact of wildfire and other disturb-

ances and result in the greatest increased in site productivity. Even-aged management is normally accomplished through clear-cut, patch cuts and heavy partial cuts (such as seed tree or shelter wood systems) which open up the site to maximum solar gain. This results in the greatest production of both young hardwood that is important to wildlife and the spruce understory valuable years later as timber. Even-aged management techniques are utilized to provide young, vigorously growing stands in juxtaposition to older, undisturbed stands. Such placement of harvest units can be optimizing natural seedling and the edge effect.

- c. Topography and Soils: The proposed sale will be designed and managed to prevent significant impairment of the land and water with respect to renewable resources (AS 41.17.060(c)(5)). A shallow mineral soil layer on top of alluvial sand and gravel dominate the soil profile. Slopes in the harvest areas are nearly flat.
2. Agriculture. There is no current nor anticipated agricultural activity in the harvest areas.
3. Wildlife habitat and harvest. Most common species of wildlife that are normally found in interior Alaska forests inhabit the area. Where practical, mature balsam poplar and quaking aspen will be protected, and operators encouraged, but not required to, leave dead standing trees for cavity nesting birds and other habitat components and uses.

The timber sale harvest will afford more sunlight to the forest floor and will increase the production of browse species for moose. The increase in sunlight will also enhance the production of a variety of berries and seeds eaten by grouse and other animals.
4. Fish Habitat, water resources, and water quality. The proposed sale will be designed and managed to protect fish habitat and water quality in compliance with the Forest Resources and Practices Act and regulations (AS 41.17 and 11 AAC 95) . There are no fish-bearing waters in the sale area.
5. Recreation, tourism, and scenic resources. Increased access through spur roads and skid trails will have the largest impact on recreation. A significant portion of the harvest associated with the CWPP will be adjacent to the community of Tok and will initially be partially visible. Where feasible, given access routes and ownership, harvest units outside the community will be designed with irregular borders following natural terrain breaks. These units, once revegetated, will look much like the past burns scattered throughout the region. No harvest units are expected to be seen from the Alaska Highway.
6. Cultural Resources. DOF works with the State Historic Preservation Office (SHPO) to identify and avoid known cultural, historic or prehistoric sites in planning the proposed access routes and salvage areas. If additional archaeological sites are identified, proposed salvage areas and road locations will be appropriately adjusted to avoid conflicts. If any historic or archaeological sites are encountered during road construction or harvest activities, DOF will immediately inform SHPO and take action to protect the findings.
7. Subsurface Resources. Mining is a subsurface land interest. Timber harvest is generally allowed on these lands. The new road access from this harvest can be of benefit to existing and future mining claims. Individual mining claims will be addressed as site specific FLUPs are presented for review.

## **G. Costs and benefits**

No significant negative economic effects are anticipated upon the timber markets, local or regional, as result of this proposed action. Utilization of the proposed timber volume may provide a short-term benefit to the local economy due to the availability of low-cost fuel for home heating and jobs in timber harvesting. DOF will need to monitor firewood harvesting operations near the proposed sale areas because of the strong possibility of illegal harvesting. DOF may have to close roads to the commercial and personal use timber sales to prevent unauthorized harvest. Public use firewood demand on this area is expected to be high due to the proximity to the community. Commercial timber harvest contracts will stipulate regular road maintenance on the access roads that are used during harvest operations facilitating public access to private and public lands.

## **VI. PUBLIC REVIEW**

The public and agencies are invited to comment on this Proposed Best Interest Finding. Objections or comments pertaining to the proposed action must be received in writing by the DOF Tok Area Office **by 4:30 on July 19, 2019** in order to ensure consideration for review. Comments should be mailed to the State of Alaska, Division of Forestry, PO BOX 10 Tok, AK 99780, or by email to [nick.carter@alaska.gov](mailto:nick.carter@alaska.gov). For more information you may contact the Tok Area Office, 907-883-1400. To be eligible to appeal the final decision, a person must have provided written comment **by 4:30 on July 19, 2019**.

## **VII. PUBLIC NOTICE**

This PBIF was publicly noticed in compliance with AS 38.05.945. Notice was posted on the Alaska Online Public Notice System and distributed through both email and physical mailing lists. Notice was also posted in the local Tok Area Forestry office.

## **VIII. ALTERNATIVES AND DISCUSSION**

There are four possible alternatives to consider for this project area. A discussion of each of the alternatives follows. All alternatives are consistent with the area plan and applicable statutes and regulations.

### **A. Continue the sale as proposed:**

This alternative meets the objectives of DNR's constitutional mandate and has been determined to be consistent with the land classification. Additional employment opportunities will occur associated with harvest operations, saw milling and value-added processing. The sales are designed to minimize the potential for loss from wildland fire, maximize the feasibility of the sale to the State, and provide for natural reforestation of the harvest area.

### **B. Modify the sale by making it smaller or larger:**

The estimated volume and acreage of timber to be harvested as stated in this Best Interest Finding is designed to accommodate the existing and emerging markets in the Tok vicinity. Decreasing or increasing the size of the harvest units could make the sale(s) less feasible to the State and the Purchaser.

C. Defer the sale to a later date:

Deferring harvest to a later date would fail to meet many of the objectives of the sale. In addition to the economic loss to the State and the local timber industry there would be an extended risk to the timber in the sale from wildfire, insect infestations, windthrow and other natural processes associated with over-mature timber.

D. Take no action:

This alternative would result in not meeting any of the objectives outlined for this management action. Utilization of the forest resource would not be achieved. There would be no contribution to the State and local economies.

## **IX. RECOMMENDATION AND PRELIMINARY DECISION**

After due consideration of all pertinent information and alternatives, the DNR has reached the following Preliminary Decision: To offer for sale approximately 260 acres of white spruce mixed pole and sawtimber to reduce the hazardous fuels and provide fuelwood and sawlogs as proposed in Alternative 1 and described in this PBIF. The DOF finds that this preliminary decision satisfies the objectives stated in this document and it is in the best interest of the State to proceed with this action under its authority of AS 38.05.035(e) (Powers and Duties of the Director) & AS 38.05.110-120; 11 AAC 71 (Timber Sale Statutes and Regulations).

A person is eligible to participate in any appeal or request for reconsideration to the final finding if s/he has submitted comment to the preliminary finding and decision during the comment period.

If you have any questions, please contact Nick Carter, Tok/Copper River Area Forester, [nick.carter@alaska.gov](mailto:nick.carter@alaska.gov), 907-883-1400.



**X. SIGNATURE**



**Nick Carter, Tok/Copper River Area Forester**  
Alaska Division of Forestry

June 18, 2019  
Date

**XI. ATTACHMENTS**

Maps of the proposed project area follow.



